REMARKS

The Examiner rejects claims 1-18 under 35 U.S.C. § 102(b) as allegedly anticipated by U.S. Patent No. 5,999,929 A to Goodman (hereinafter "GOODMAN"). Applicants respectfully traverse this rejection.

By way of the Amendment, Applicants amend claims 1, 3-4, 6-7, 9, 12, 14, and 17 to improve form, and add new dependent claims 21 and 22. No new matter has been added by the present Amendment. Claims 1-7, 9-12, and 14-22 are pending.

Prosecution History

1) The Examiner issued a first non-final Office Action, dated September 21, 2007, in which claims 1-18 were rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by GOODMAN. Applicants filed an Amendment, dated December 21, 2007, explaining why claims 1-18 are not anticipated by GOODMAN.

2) The Examiner subsequently issued a second non-final Office Action, dated March 21, 2008, in which claims 1-18 were rejected as allegedly anticipated by U.S. Patent No. 6,718,333 to Matsuda (hereinafter "MATSUDA"). In addition, the Examiner stated, referring to the previous GOODMAN rejection (Office Action dated March 21, 2008, p. 14):

> Applicant's arguments with respect to the rejection(s) of claim 1-18 under 102 have been fully considered and are persuasive. Therefore, the rejection has been withdrawn. However, upon further consideration, a new ground(s) of rejection is made.

3) The Examiner issued a third non-final Office Action, dated September 30, 2008, withdrawing the previous rejection based on MATSUDA and once again rejecting claims 1-7, 9-12, and 14-20 under 35 U.S.C. § 102(b) as allegedly being anticipated by GOODMAN.

The Examiner has not provided any explanation why the Examiner is issuing another rejection under 35 U.S.C. § 102(b) based on GOODMAN, after finding Applicant's arguments with respect to GOODMAN persuasive and withdrawing the previous rejection under 35 U.S.C. § 102(b) based on GOODMAN. Furthermore, the Examiner has not addressed Applicants' previous arguments regarding why claims 1-18 are not anticipated by GOODMAN. Applicants respectfully request that the Examiner provide an explanation as to why the Examiner is again relying on GOODMAN. Applicants further respectfully request that the Examiner address Applicants' arguments explaining why claims 1-18 are not anticipated by GOODMAN.

Rejection under 35. U.S.C. § 102(b) based on GOODMAN

Claims 1-18 stand rejected under 35 U.S.C. § 102(b) as allegedly anticipated by GOODMAN. Applicants respectfully traverse this rejection.

At the outset, Applicants note that claims 8 and 13 were previously canceled. Furthermore, the Examiner addressed claims 19 and 20 under this rejection. Therefore, Applicants assume the Examiner intended this rejection to apply to claims 1-7, 9-12, and 14-20.

A proper rejection under 35 U.S.C. § 102 requires that a reference teach every aspect of the claimed invention. Any feature not directly taught must be inherently present. See M.P.E.P. § 2131. GOODMAN does not disclose the combination of features recited in Applicant's claims 1-7, 9-12, and 14-20.

Amended independent claim 1 is directed to a method performed by a computer system. The method includes receiving a first uniform resource locator (URL); selecting

one or more parameters present in the first URL; generating a plurality of different URLs having different parameter combinations of the one or more selected parameters; retrieving content using the first URL; retrieving using the plurality of different URLs; comparing, by a processor of the computer system, the content retrieved using the first URL to the content retrieved using the plurality of different URLs; identifying, based on the comparing, one of the parameter combinations, that, when present in a particular URL, results in retrieving content that is approximately the same as the content corresponding to the first URL, the identifying being performed by the processor; and generating, by the processor, one or more URL rewrite rules based on the identified one of the parameter combinations. GOODMAN does not disclose or suggest this combination of features.

For example, GOODMAN does not disclose or suggest retrieving content using a plurality of different URLs having different parameter combinations of one or more selected parameters, as recited in amended claim 1. The Examiner relies col. 7-8, lines 24-53 of GOODMAN for allegedly disclosing this feature (Office Action, p. 3). Applicant will assume the Examiner is relying on col. 7, line 24 to col. 8, line 53 of GOODMAN. Applicants disagree with the Examiner's interpretation of GOODMAN.

Col. 7, line 24 to col. 8, line 53 of GOODMAN disclose a method of determining a new re-write rule for URLs. This section of GOODMAN discloses that the Web page analyzer compares each Web page in a cache with every other Web page in the cache to find matching pages. For each pair of matching pages, the Web page analyzer applies all previously-established rules to determine if the URLs corresponding to the two matching pages are identical. If, after all the re-write rules have been applied, the two URLs are

not identical, the Web page analyzer determines that a new rule needs to be created. The new rule is created by finding the shortest substitution rule that changes one of the URLs into the other URL. The Web page analyzer then applies the new rule to the URL to see if the result is a URL of an actual Web page stored in the cache. If the Web page analyzer determines that the URLs match, it increments a "hits" counter for the new rule. If the URLs do not match, a "misses" counter is incremented for the new rule. After applying the re-write rule to all the pages in the matching page list, the Web page analyzer will store the new re-write rule if the ratio of "misses" to "hits" is lower than a threshold. If the ratio is higher than the threshold, the Web page analyzer makes the rule more specific by adding more steps to it.

Therefore, this section of GOODMAN discloses finding a pair of matching Web pages in a cache and applying existing re-write rules to the corresponding URLs to determine if the URLs can be made identical. If the existing re-write rules do not result in identical URLs, the method of GOODMAN generates a new re-write rule by finding a substitution that turns one of the URLs into the other URL. This section (or any other section) of GOODMAN does not disclose or suggest selecting one or more parameters in a URL. Therefore, this section (or any other section) of GOODMAN does not disclose or suggest a plurality of URLs having different parameter combinations of one or more selected parameters. Applicants submit that this section (or any other section) of GOODMAN does not disclose or suggest anything that could reasonably be interpreted as different URL parameter combinations of one or more parameters. If this rejection is maintained, Applicants respectfully request that the Examiner explicitly state which elements or features disclosed by GOODMAN the Examiner is relying on for allegedly

disclosing different URL parameter combinations of one or more selected parameters. Since this section of GOODMAN does not disclose or suggest different URL parameter combinations of one or more selected parameters, this section of GOODMAN cannot disclose or suggest retrieving content using a plurality of different URLs having different parameter combinations of one or more selected parameters, as recited in amended claim 1.

In fact, GOODMAN compares every Web page in a cache with every other Web page in the cache. Even if it assumed, for the sake of argument, that comparing Web pages in a cache can be reasonably interpreted as retrieving content using a plurality of URLs (a point Applicants do not concede), this section of GOODMAN compares Web pages without any analysis or comparison of the corresponding URLs of the Web pages. Only after two Web pages are deemed identical does the method of GOODMAN turn to analyzing the URLs corresponding to the matched Web pages. Therefore, this section (or any other section) of GOODMAN cannot disclose or suggest retrieving content using a plurality of different URLs having different parameter combinations of one or more selected parameters, as recited in amended claim 1.

Moreover, GOODMAN does not disclose or suggest identifying, based on comparing content retrieved using a first URL to content retrieved using a plurality of different URLs, a parameter combination, that, when present in a particular URL, results in retrieving content that is approximately the same as content corresponding to the first URL, the identifying being performed by a processor, as also recited in amended claim 1. The Examiner relies col. 7-8, lines 24-53 of GOODMAN for allegedly disclosing "identifying a parameter combination form the plurality of URLs that corresponds to

content that is approximately the same as content corresponding to the first URL" (Office Action, p. 3). Applicant will assume the Examiner is relying on col. 7, line 24 to col. 8, line 53 of GOODMAN. Applicants disagree with the Examiner's interpretation of GOODMAN.

Col. 7, line 24 to col. 8, line 53 of GOODMAN disclose a method of determining a new re-write rule for URLs. This section of GOODMAN discloses that the Web page analyzer compares each Web page in a cache with every other Web page in the cache to find matching pages. For each pair of matching pages, the Web page analyzer applies all previously-established rules to determine if the URLs corresponding to the two matching pages are identical. If, after all the re-write rules have been applied, the two URLs are not identical, the Web page analyzer determines that a new rule needs to be created. The new rule is created by finding the shortest substitution rule that changes one of the URLs into the other URL. The Web page analyzer then applies the new rule to the URL to see if the result is a URL of an actual Web page stored in the cache. If the Web page analyzer determines that the URLs match, it increments a "hits" counter for the new rule. If the URLs do not match, a "misses" counter is incremented for the new rule. After applying the re-write rule to all the pages in the matching page list, the Web page analyzer will store the new re-write rule if the ratio of "misses" to "hits" is lower than a threshold. If the ratio is higher than the threshold the Web page analyzer makes the rule more specific by adding more portions of it.

This section of GOODMAN does not disclose or suggest identifying a parameter combination. Instead, this section of GOODMAN discloses a re-write rule based on a substitution rule that converts one URL into another URL. Therefore, this section (or any

other section) of GOODMAN cannot disclose or suggest identifying, based on comparing content retrieved using a first URL to content retrieved using a plurality of different URLs, a parameter combination, that, when present in a particular URL, results in retrieving content that is approximately the same as content corresponding to the first URL, the identifying being performed by a processor, as recited in amended claim 1.

Additionally, Applicants submit that the method of claim 1 provides benefits not available with the method disclosed by GOODMAN. The method of GOODMAN requires comparing every page with every other page in a cache, which is a very computationally intensive process. In contrast, the method of claim 1 requires comparing only a few pages (see, for example, Fig. 6 of the present application).

For at least the foregoing reasons, Applicants submit that claim 1 is not anticipated by GOODMAN. Accordingly, Applicants respectfully request that the rejection of claim 1 under 35 U.S.C. § 102(b) based on GOODMAN be reconsidered and withdrawn.

Claims 2-6 depend from claim 1. Therefore, these claims are not anticipated by GOODMAN for at least the reasons set forth above with respect to claim 1. Accordingly, Applicants respectfully request that the rejection of claims 2-6 under 35 U.S.C. § 102(b) based on GOODMAN be reconsidered and withdrawn.

Independent claim 7 is directed to a method for converting a uniform resource locator (URL) into a canonical form of the URL. The method includes receiving a URL that refers to content and that contains a parameter set including at least one parameter, selecting a rewrite rule by receiving a plurality of URLs that contain the parameter set and identifying parameters in the parameter set that do not result in retrieving

substantially different content, when present in a URL, applying the rewrite rule to the URL by removing the parameters that do not contribute to content from the URL, and outputting the rewritten URL as the canonical form of the URL. GOODMAN does not disclose or suggest this combination of features.

For example, GOODMAN does not disclose or suggest selecting a rewrite rule by receiving a plurality of URLs that contain the parameter set and identifying parameters in the parameter set that do not result in retrieving substantially different content, when present in a URL, as recited in claim 7. The Examiner relies on col. 5, lines 17-21 of GOODMAN for allegedly disclosing this feature (Office Action, p. 6). Applicants respectfully disagree with the Examiner's interpretation of GOODMAN.

Col. 5, lines 17-21 of GOODMAN disclose:

> To assist in the duplicate Web page consolidation operation, the Web page analyzer 15 develops the URL re-write rulebase 16B, which contains rules which are used by the Web page analyzer 15 to convert URLs to respective canonical forms.

This section of GOODMAN discloses that the Web page analyzer converts URLs into canonical forms. This section of GOODMAN does not disclose or suggest anything about parameters, or about whether any particular section of a URL affects the content. Therefore, this section of GOODMAN cannot disclose or suggest selecting a rewrite rule by receiving a plurality of URLs that contain the parameter set and identifying parameters in the parameter set that do not result in retrieving substantially different content, when present in a URL, as recited in claim 7. If this rejection is maintained, Applicants respectfully request that the Examiner explain how the above section of GOODMAN (or any other section of GOODMAN) can reasonably be construed as disclosing the above feature of claim 7.

For at least the foregoing reasons, Applicants submit that claim 7 is not anticipated by GOODMAN. Accordingly, Applicants respectfully request that the rejection of claim 7 under 35 U.S.C. § 102(b) based on GOODMAN be reconsidered and withdrawn.

Claims 9-11 depend from claim 7. Therefore, these claims are not anticipated by GOODMAN for at least the reasons set forth above with respect to claim 7. Accordingly, Applicants respectfully request that the rejection of claims 9-11 under 35 U.S.C. § 102(b) based on GOODMAN be reconsidered and withdrawn.

Independent claim 12 recites features similar to, yet possibly of different scope than, the features recited above with respect to claim 7. Therefore, this claim is not anticipated by GOODMAN for at least reasons similar to the reasons set forth above with respect to claim 7. Accordingly, Applicants respectfully request that the rejection of claim 12 under 35 U.S.C. § 102(b) based on GOODMAN be reconsidered and withdrawn.

Claims 14-16 depend from claim 12. Therefore, these claims are not anticipated by GOODMAN for at least the reasons set forth above with respect to claim 12. Accordingly, Applicants respectfully request that the rejection of claims 14-16 under 35 U.S.C. § 102(b) based on GOODMAN be reconsidered and withdrawn.

Independent claim 17 and 18 recite features similar to, yet possibly of different scope than, the features recited above with respect to claim 1. Therefore, these claims are not anticipated by GOODMAN for at least reasons similar to the reasons set forth above with respect to claim 1. Accordingly, Applicants respectfully request that the rejection of

claims 17 and 18 under 35 U.S.C. § 102(b) based on GOODMAN be reconsidered and withdrawn.

Claim 19 depends from claim 17. Therefore, this claim is not anticipated by GOODMAN for at least the reasons set forth above with respect to claim 17. Accordingly, Applicants respectfully request that the rejection of claim 19 under 35 U.S.C. § 102(b) based on GOODMAN be reconsidered and withdrawn.

Claim 20 depends from claim 18. Therefore, this claim is not anticipated by GOODMAN for at least the reasons set forth above with respect to claim 18. Accordingly, Applicants respectfully request that the rejection of claim 20 under 35 U.S.C. § 102(b) based on GOODMAN be reconsidered and withdrawn.

New Claims

New dependent claim 21 depends from claim 17. Therefore, this claim is patentable over GOODMAN for at least the reasons set forth above with respect to claim 17.

New dependent claim 22 depends from claim 18. Therefore, this claim is patentable over GOODMAN for at least the reasons set forth above with respect to claim 18.

Conclusion

In view of the foregoing amendments and remarks, Applicants respectfully request the Examiner's reconsideration of the application and the timely allowance of the pending claims.

As Applicants' remarks with respect to the Examiner's rejections are sufficient to overcome these rejections, Applicants' silence as to assertions by the Examiner in the Office Action or certain requirements that may be applicable to such assertions (e.g., whether a reference constitutes prior art, reasons to modify a reference and/or to combine references, assertions as to dependent claims, etc.) is not a concession by Applicants that such assertions are accurate or such requirements have been met, and Applicants reserve the right to analyze and dispute such assertions/requirements in the future.

While the present application is now believed to be in condition for allowance, should the Examiner find some issue to remain unresolved, or should any new issues arise which could be eliminated through discussions with Applicants' representative, then the Examiner is invited to contact the undersigned by telephone in order to expedite prosecution of this application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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